

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Eruby Abrego,)
Plaintiff,) Case No: 23 CV 1740
v.)
Reynaldo Guevara et al.,)
Defendant.)

**SUPPLEMENTAL PRIVILEGE LOG OF THE COOK COUNTY
STATE'S ATTORNEY'S OFFICE IN RESPONSE TO SUBPOENA**

NOW COMES the Cook County State's Attorney's Office, by and through Assistant State's Attorney, Ashlee Doss, and submits the following Supplemental Privilege Log with respect to documents in its possession or control, in response to the subpoena issued by Loevy & Loevy, and The Sotos Law Firm, respectively on October 11, 2023 and April 22, 2024, to the Cook County State's Attorney's Office.

Bates Stamped CCSAO	Withheld or Redacted	Description	Privilege(s) Asserted
011086- 011087, 011091, 011103, 011133, 011163, 011193	Redacted	DOBs, SSNs, Addresses, Telephone Numbers	Personal Identity Information, Privacy Concerns [725 ILCS 120/4 (Crime Victims) and 815 ILCS 530 disclosure of private information
011220- 011223	Withheld	ASA Notes: Unknown ASA Author, Impressions of proceeding as reflected in transcript and affidavit. Unspecified date of creation. Deliberative process of CCSAO	Attorney Work Product/Deliberative Process
011226, 011230- 011232, 011343- 011348	Redacted	ASA Notes: Unknown ASA Author, Impressions of proceeding as reflected in an affidavit. Unspecified date of creation. Deliberative process of CCSAO	Attorney Work Product/Deliberative Process

011498, 011505, 011512, 011519, 011526, 011536- 011537	Redacted	DOBs, SSNs, Addresses, Telephone Numbers	Personal Identity Information, Privacy Concerns [725 ILCS 120/4 (Crime Victims) and 815 ILCS 530 disclosure of private information
011539- 011540- 011542, 011544- 011546	Redacted	ASA Notes: Unknown ASA Author, Impressions of proceeding as reflected in an affidavit. Unspecified date of creation. Deliberative process of CCSAO	Attorney Work Product/Deliberative Process
011562, 011564- 011566, 011568- 011569, 011578- 011583, 011586, 011589- 011591, 011595, 011600, 011607- 011609, 011615- 001618	Redacted	DOBs, SSNs, Addresses, Telephone Numbers	Personal Identity Information, Privacy Concerns [725 ILCS 120/4 (Crime Victims) and 815 ILCS 530 disclosure of private information
001619- 011646	Withheld	LEADS	20 Ill. Admin. Code 1240.80(d)
011655, 011668, 011670- 011673, 011677, 011680, 011683, 011760, 011762, 011794, 011797, 011805, 011827, 011829- 011834	Redacted	DOBs, SSNs, Addresses, Telephone Numbers, License Plate Numbers	Personal Identity Information, Privacy Concerns [725 ILCS 120/4 (Crime Victims) and 815 ILCS 530 disclosure of private information
011835-	Withheld	LEADS	20 Ill. Admin. Code 1240.80(d)

011852			
011866- 011867, 011876- 011880, 011882- 011884, 011886, 011897- 011898, 011901, 011909, 011915, 011918, 011938, 011941, 011943- 011944, 011948, 011956, 011960, 011962, 011964, 011973- 011977, 011984- 011996, 012002, 012003, 012014	Redacted	DOBs, SSNs, Addresses, Telephone Numbers, License Plate Numbers, Driver's License Numbers	Personal Identity Information, Privacy Concerns [725 ILCS 120/4 (Crime Victims) and 815 ILCS 530 disclosure of private information
012026- 012028, 012032, 012035- 012037, 012092	Redacted	DOBs, SSNs, Addresses, Telephone Numbers, License Plate Numbers, Driver's License Numbers	Personal Identity Information, Privacy Concerns [725 ILCS 120/4 (Crime Victims) and 815 ILCS 530 disclosure of private information
012105- 012111	Withheld	LEADS	20 Ill. Admin. Code 1240.80(d)
012150, 012155, 012159- 012160, 012210, 012212- 012213, 012217-	Redacted	DOBs, SSNs, Addresses, Telephone Numbers, License Plate Numbers, Driver's License Numbers, VIN Numbers	Personal Identity Information, Privacy Concerns [725 ILCS 120/4 (Crime Victims) and 815 ILCS 530 disclosure of private information

012222 012224- 012225, 012230- 012231, 012263, 012266, 012270, 012278, 012282- 012286, 012289, 012294, 012300, 012317- 012320, 012323- 012325, 012327- 012328, 012344- 012345			
012347- 012359, 012361- 012362	Withheld	ASA Notes: Unknown ASA Author, Case Strategy/trial notes. Unspecified date of creation. Deliberative process of CCSAO	Attorney Work Product/ Deliberative Process
012372, 012384, 012407, 012419, 012442, 012477, 012490	Redacted	DOBs, SSNs, Addresses, Telephone Numbers, License Plate Numbers, Driver's License Numbers, VIN Numbers	Personal Identity Information, Privacy Concerns [725 ILCS 120/4 (Crime Victims) and 815 ILCS 530 disclosure of private information
012597, 012706- 012717, 012719- 012727	Withheld	Personal Medical Records of Eruby Abrego at Cermak Health Services of Cook County	Private Health Information/HIPAA
012598- 012603	Withheld	ASA Notes: Unknown ASA Author, Case notes. Unspecified date of creation. Deliberative process of CCSAO	Attorney Work Product/ Deliberative Process
012618, 012628, 012645, 012655, 012672,	Redacted	DOBs, SSNs, Addresses, Telephone Numbers, License Plate Numbers, Driver's License Numbers, VIN Numbers	Personal Identity Information, Privacy Concerns [725 ILCS 120/4 (Crime Victims) and 815 ILCS 530 disclosure of private information

012682, 012698, 012701, 012704, 012732, 012795, 012859, 012869, 012886, 012896, 012913, 012923, 012940, 012950, 012974, 012976, 012978, 012991, 013008, 013010, 013012, 013042, 013044, 013046, 013076, 013078, 013080, 013093- 013094			
013107- 013109, 013120, 013122, 013129, 013137, 013141- 013142, 013156- 013157, 013163, 013165	Redacted	DOBs, SSNs, Addresses, Telephone Numbers, License Plate Numbers, Driver's License Numbers, VIN Numbers	Personal Identity Information, Privacy Concerns [725 ILCS 120/4 (Crime Victims) and 815 ILCS 530 disclosure of private information
013170- 013176	Redacted	Photo Lineup	Physical line up photos protected under 725 ILCS 5/107A-2
013190, 013192-	Redacted	DOBs, SSNs, Addresses, Telephone Numbers, License Plate Numbers, Driver's	Personal Identity Information, Privacy Concerns [725 ILCS

013193, 013195, 013198		License Numbers, VIN Numbers	120/4 (Crime Victims) and 815 ILCS 530 disclosure of private information
013200- 013203	Withheld	Personal Medical Records of Juan Hernandez at Bethany Hospital	Private Health Information/HIPAA
013209, 013212- 013214, 013226, 013228- 013229, 013254, 013268- 013271, 013277	Redacted	DOBs, SSNs, Addresses, Telephone Numbers, License Plate Numbers, Driver's License Numbers,	Personal Identity Information, Privacy Concerns [725 ILCS 120/4 (Crime Victims) and 815 ILCS 530 disclosure of private information
013278, 013301- 013302, 013320- 013323	Withheld	Personal Medical Records of Wilfredo Arroyo at St. Elizabeth's Hospital	Private Health Information/HIPAA
013279, 013281- 013287, 013290- 013291, 013293, 013303- 013305, 013308, 013324- 013326, 013334, 013337, 013339, 013342- 013345, 013347, 013350, 013354, 013356, 013362- 013363, 013368, 013372, 013376, 013378-	Redacted	DOBs, SSNs, Addresses, Telephone Numbers, License Plate Numbers, Driver's License Numbers,	Personal Identity Information, Privacy Concerns [725 ILCS 120/4 (Crime Victims) and 815 ILCS 530 disclosure of private information

013379, 013387			
013386, 013409- 013410, 013428- 013431, 013494, 013517- 013518	Withheld	Personal Medical Records of Wilfredo Arroyo at St. Elizabeth's Hospital	Private Health Information/HIPAA
013389- 013395, 013398- 013399, 013401, 013411- 013413, 013416, 013433, 013452- 013453, 013455, 013464, 013470, 013480, 013484, 013486- 013487, 013491, 013493, 013495- 013504- 013507, 013509, 013519- 013521	Redacted	DOBs, SSNs, Addresses, Telephone Numbers,	Personal Identity Information, Privacy Concerns [725 ILCS 120/4 (Crime Victims) and 815 ILCS 530 disclosure of private information
013536- 013539	Withheld	Personal Medical Records of Wilfredo Arroyo at St. Elizabeth's Hospital	Private Health Information/HIPAA
013541, 013560- 013561, 013563, 013566, 013570, 013572, 013578-	Redacted	DOBs, SSNs, Addresses, Telephone Numbers, Driver's License Numbers	Personal Identity Information, Privacy Concerns [725 ILCS 120/4 (Crime Victims) and 815 ILCS 530 disclosure of private information

013579, 013582, 013584, 013588, 013592- 013596, 013599, 013601			
013602, 013625- 013626, 013644- 013647	Withheld	Personal Medical Records of Wilfredo Arroyo at St. Elizabeth's Hospital	Private Health Information/HIPAA
013603, 013605- 013611, 013615, 013617, 013627- 013629, 013632, 013648- 013650, 013661, 013663, 013668- 013669, 013671, 013686, 013692- 013693, 013702- 013703, 013720- 013721, 013738- 013739	Redacted	DOBs, SSNs, Addresses, Telephone Numbers, License Plate Numbers, Driver's License Numbers,	Personal Identity Information, Privacy Concerns [725 ILCS 120/4 (Crime Victims) and 815 ILCS 530 disclosure of private information
013700- 013701, 013718- 013719, 013736- 013737, 013754- 013755	Withheld	LEADS	20 Ill. Admin. Code 1240.80(d)
013756-	Redacted	DOBs, SSNs, Addresses, Telephone	Personal Identity Information,

013757, 013770, 013774- 013777, 013779- 013781, 013793- 013787, 013792, 013797, 013810, 013814- 013817, 013819- 013821, 013823- 013825- 013826, 013832, 013837, 013850, 013854- 013857, 013859- 013860, 013965- 013867, 013872, 013890, 013894- 013897, 013899, 013905- 013907, 013912, 013932, 013934, 013937, 013939, 013944- 013946, 013948, 013951, 013954- 013955, 013976,		Numbers, License Plate Numbers, Driver's License Numbers	Privacy Concerns [725 ILCS 120/4 (Crime Victims) and 815 ILCS 530 disclosure of private information
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014365, 014367, 014375, 014378- 014381, 014385, 014394- 014395, 014399, 014403 - 014404 , 014409- 014420			
014382, 014421	Withheld	Personal Medical Record of Delia Leal at Chicago Fire Department	Private Health Information/HIPAA
014422, 014424, 014433, 014438	Redacted	DOBs, SSNs, Addresses, Telephone Numbers, License Plate Numbers, Driver's License Numbers,	Personal Identity Information, Privacy Concerns [725 ILCS 120/4 (Crime Victims) and 815 ILCS 530 disclosure of private information
014442- 014480	Withheld	ASA Notes: Unknown ASA Author, Case notes. Unspecified date of creation. Deliberative process of CCSAO	Attorney Work Product/Deliberative Process
014755- 014799	Withheld	ASA Notes: Unknown ASA Author, Case notes. Unspecified date of creation. Deliberative process of CCSAO	Attorney Work Product/Deliberative Process
014831, 014893, 015125, 015135, 015152, 015162, 015179, 015189, 015206, 015216, 015255- 015259, 015263- 015264, 015266, 015268, 015271, 015273- 015279, 015281,	Redacted	DOBs, SSNs, Addresses, Telephone Numbers, License Plate Numbers, Driver's License Numbers,	Personal Identity Information, Privacy Concerns [725 ILCS 120/4 (Crime Victims) and 815 ILCS 530 disclosure of private information

015283, 015288, 015295, 015302, 015311			
015339- 015340	Withheld	ASA Notes: Unknown ASA Author, Case notes regarding potential trial exhibits. Unspecified date of creation. Deliberative process of CCSAO	Attorney Work Product/Deliberative Process
015345- 015347, 015432, 015448- 015449, 015603, 015640- 015659, 016279- 016280, 016417- 016418, 016478, 016483, 016503, 016508, 016528, 016553, 016558	Redacted	DOBs, SSNs, Addresses, Telephone Numbers, License Plate Numbers, Driver's License Numbers,	Personal Identity Information, Privacy Concerns [725 ILCS 120/4 (Crime Victims) and 815 ILCS 530 disclosure of private information
016470, 016675- 016676	Redacted	ASA Notes: Unknown ASA Author, Mental impressions regarding testimony. Unspecified date of creation. Deliberative process of CCSAO	Attorney Work Product/Deliberative Process
016679, 016810, 016887, 016976, 017053, 017219	Redacted	DOBs, SSNs, Addresses, Telephone Numbers, License Plate Numbers, Driver's License Numbers,	Personal Identity Information, Privacy Concerns [725 ILCS 120/4 (Crime Victims) and 815 ILCS 530 disclosure of private information
017308- 017310	Withheld	ASA Notes: Unknown ASA Author, Case strategy. Unspecified date of creation. Deliberative process of CCSAO	Attorney Work Product/Deliberative Process
017316- 017318, 017323	Redacted	DOBs, SSNs, Addresses, Telephone Numbers, License Plate Numbers, Driver's License Numbers	Personal Identity Information, Privacy Concerns [725 ILCS 120/4 (Crime Victims) and 815 ILCS 530 disclosure of private information

017323- 017324, 017681- 017682, 017685- 017687, 017691- 017693, 017713- 017715	Redacted	ASA Notes: Unknown ASA Author, Mental impression of affidavit. Unspecified date of creation. Deliberative process of CCSAO	Attorney Work Product/ Deliberative Process
017327- 017328, 017359- 017360, 017416, 017433, 017443	Redacted	DOBs, SSNs, Addresses, Telephone Numbers, License Plate Numbers, Driver's License Numbers	Personal Identity Information, Privacy Concerns [725 ILCS 120/4 (Crime Victims) and 815 ILCS 530 disclosure of private information
017475- 017487	Withheld	ASA Notes: Unknown ASA Author, Case notes. Unspecified date of creation. Deliberative process of CCSAO	Attorney Work Product/ Deliberative Process
017504- 017515	Withheld	LEADS	20 Ill. Admin. Code 1240.80(d)
017517, 017523, 017528- 017531, 017536, 017540, 017543, 017566, 017569, 017592, 017595	Redacted	DOBs, Addresses, Telephone Numbers	Personal Identity Information, Privacy Concerns [725 ILCS 120/4 (Crime Victims) and 815 ILCS 530 disclosure of private information
017615- 017622	Withheld	ASA Notes: Unknown ASA Author, Case notes. Unspecified date of creation. Deliberative process of CCSAO	Attorney Work Product/ Deliberative Process
017626, 017629, 017652	Redacted	DOBs, Addresses, Telephone Numbers	Personal Identity Information, Privacy Concerns [725 ILCS 120/4 (Crime Victims) and 815 ILCS 530 disclosure of private information
017653- 017654	Withheld	ASA Notes: Unknown ASA Author, Case notes. Unspecified date of creation. Deliberative process of CCSAO.	Attorney Work Product/ Deliberative Process
017655- 017660,	Redacted	ASA Notes: Unknown ASA Author, Mental Impressions and case strategy regarding case	Attorney Work Product/ Deliberative Process

017662- 017664, 017681- 017683, 017721- 017722		filings. Unspecified date of creation. Deliberative process of CCSAO.	
017666- 017671	Withheld	ASA Notes: Unknown ASA Author, Case strategy regarding case witnesses and theory of the case. Unspecified date of creation. Deliberative process of CCSAO.	Attorney Work Product/ Deliberative Process
017672- 017673, 017679, 017689, 017694, 017697, 017710- 017711, 017718, 0117723	Redacted	DOBs, Addresses, Telephone Numbers, License Plate	Personal Identity Information, Privacy Concerns [725 ILCS 120/4 (Crime Victims) and 815 ILCS 530 disclosure of private information
017709, 017725- 017751, 017754- 017755	Withheld	ASA Notes: Unknown ASA Author, Case Notes and case strategy. Unspecified date of creation. Deliberative process of CCSAO.	Attorney Work Product/ Deliberative Process
017813- 017819, 017821, 017823, 017825, 017828, 017831- 017837, 017839, 017843, 017846, 017849- 017855, 017857, 017859- 017861, 017864, 017867- 017873, 017875, 017877,	Redacted	DOBs, Addresses, Telephone Numbers, License Plate Numbers, VIN Numbers	Personal Identity Information, Privacy Concerns [725 ILCS 120/4 (Crime Victims) and 815 ILCS 530 disclosure of private information

017879, 017882			
017889- 017946, 017948- 017963, 017965- 017981	Withheld	ASA Notes: Unknown ASA Author, Case Notes and case strategy. Unspecified date of creation. Deliberative process of CCSAO.	Attorney Work Product/ Deliberative Process
017986, 017989, 017991- 017999, 018002- 018068, 018070- 018076	Withheld	ASA Notes: Unknown ASA Author, Case Notes and case strategy trial notes. Unspecified date of creation. Deliberative process of CCSAO.	Attorney Work Product/ Deliberative Process
018115, 018118- 018122, 018124- 018125, 018128- 018129, 018132- 018146, 018151, 018155, 018157, 018166- 018167, 018169- 018171, 018173- 018178, 018180- 018186, 018166- 018195	Redacted	DOBs, Addresses, Telephone Numbers, License Plate Numbers, VIN Numbers	Personal Identity Information, Privacy Concerns [725 ILCS 120/4 (Crime Victims) and 815 ILCS 530 disclosure of private information
018240- 018279, 018281- 018282, 018294- 018296, 018403- 018405,	Withheld	ASA Notes: Unknown ASA Author, Case Notes, case strategy, and mental impression regarding case filings. Unspecified date of creation. Deliberative process of CCSAO.	Attorney Work Product/ Deliberative Process

018407- 018409, 018411- 018413, 018415- 018417, 018525- 018527, 018593- 018595			
018389, 018401, 018406, 018410, 018414, 018418- 018419, 018421- 018422, 018424- 018425, 018427- 018428, 018430	Redacted	DOBs, Addresses, Telephone Numbers, License Plate Numbers, VIN Numbers	Personal Identity Information, Privacy Concerns [725 ILCS 120/4 (Crime Victims) and 815 ILCS 530 disclosure of private information
018604- 018642, 018654- 018671, 018700	Withheld	ASA Notes: Unknown ASA Author, Mental impression regarding potential case filings and potential testimony. Unspecified date of creation. Deliberative process of CCSAO.	Attorney Work Product/Deliberative Process
018672- 018673, 018722, 018733, 018735, 018737	Redacted	DOBs, Addresses, Telephone Numbers, License Plate Numbers, VIN Numbers	Personal Identity Information, Privacy Concerns [725 ILCS 120/4 (Crime Victims) and 815 ILCS 530 disclosure of private information
018718	Redacted	Grand Jury Information.	Grand Jury 725 ILCS 5/112-6
018719- 018720, 018722, 018726, 018734, 018736, 018742- 018744, 018746, 018747,	Redacted	ASA Notes: Unknown ASA Author, Mental Impressions regarding court hearings and case Strategy. Unspecified date of creation. Deliberative process of CCSAO.	Attorney Work Product/Deliberative Process

018749- 018750, 018752, 018754, 018756, 018762, 018764- 018766, 018770			
018768, 018774, 018784, 018835, 018840, 018846- 018850	Redacted	DOBs, Addresses, Telephone Numbers, License Plate Numbers, VIN Numbers	Personal Identity Information, Privacy Concerns [725 ILCS 120/4 (Crime Victims) and 815 ILCS 530 disclosure of private information
018769	Redacted	Grand Jury True Bill Indictment	Grand Jury 725 ILCS 5/112-6
018800- 018802	Withheld	ASA Notes: Unknown ASA Author, Mental Impressions regarding court hearings and case Strategy. Unspecified date of creation. Deliberative process of CCSAO.	Attorney Work Product/Deliberative Process
018877- 018878, 018880- 018881, 018883- 018884, 018887- 018888, 018891- 018899, 018901- 018905 , 018908, 018910, 018914- 018916, 018925- 018926, 018928- 018932, 018935- 018936, 018939- 018941, 018943-	Redacted	DOBs, Addresses, Telephone Numbers, License Plate Numbers, VIN Numbers	Personal Identity Information, Privacy Concerns [725 ILCS 120/4 (Crime Victims) and 815 ILCS 530 disclosure of private information

018949, 018951, 018953, 018956, 018958, 018962- 018964, 018975- 018982, 018984- 019001, 019003- 019008, 019010- 019048, 019058, 019145, 019153, 019157, 019272, 019284			
019317- 019318, 019325- 019326, 019335, 019543, 019557	Redacted	ASA Notes: Unknown ASA Author, Mental Impressions regarding potential case filings. Unspecified date of creation. Deliberative process of CCSAO.	Attorney Work Product/ Deliberative Process
019559	Redacted	Address	Personal Identity Information, Privacy Concerns [725 ILCS 120/4 (Crime Victims) and 815 ILCS 530 disclosure of private information
019560- 019561, 019595- 019596	Withheld	Personal Medical Records of Eruby Abrego at Cermak Health Services	Private Health Information/HIPAA
019564, 019574	Redacted	DOBs, Addresses, Telephone Numbers, License Plate Numbers, VIN Numbers	Personal Identity Information, Privacy Concerns [725 ILCS 120/4 (Crime Victims) and 815 ILCS 530 disclosure of private information
019756- 019760, 019762- 019765,	Redacted	ASA Notes: Unknown ASA Author, Mental Impressions regarding potential case filings. Unspecified date of creation. Deliberative process of CCSAO.	Attorney Work Product/ Deliberative Process

019766			
019864- 019868	Redacted	DOBs, Addresses, Telephone Numbers, License Plate Numbers, VIN Numbers	Personal Identity Information, Privacy Concerns [725 ILCS 120/4 (Crime Victims) and 815 ILCS 530 disclosure of private information

Respectfully submitted,

KIMBERLY M. FOXX
Cook County State's Attorney

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Assistant State's Attorney
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(312) 603-3184
Ashlee.doss@cookcountysao.org